

Jeffrey Weston Shields (#2948)
JONES WALDO HOLBROOK & McDONOUGH
170 South Main Street, Suite 1500
Salt Lake City, UT 84101
Telephone: (801) 521-3200
Facsimile: (801) 328-0537
Email: jshields@joneswaldo.com

Attorneys for Jones Waldo Holbrook & McDonough, P.C.

IN THE UNITED STATES BANKRUPTCY COURT FOR THE
DISTRICT OF UTAH, CENTRAL DIVISION

In re:

AMERICAN INSTITUTIONAL
PARTNERS, LLC,

Debtor.

Bankruptcy No. 09-25375

(Chapter 11)

Honorable Judith A. Boulden

**OBJECTION OF CREDITOR JONES WALDO HOLBROOK & McDONOUGH, P.C.
TO U.S. TRUSTEE'S RECOMMENDATION OF AUTOMATIC DISMISSAL**

Jones Waldo Holbrook & McDonough, P.C. (hereinafter "JWHM"), a creditor of Debtor American Institutional Partners, LLC (the "Debtor") respectfully objects to the recommendation of the U.S. Trustee's Office dated October 7, 2009 (Docket No. 57), for the automatic dismissal of the above-entitled Chapter 11 case of the Debtor. In support of its objection, JWHM represents as follows:

1. JWHM is a general unsecured creditor of the Debtor for pre-petition legal services provided to Debtor, in the amount of approximately \$500,000.00

2. JWHM has become aware of a fifty (50%) ownership interest held by a wholly-owned subsidiary of the Debtor, in Little Exuma Island, located in the Bahamas, which JWHM believes to have significant value.

3. JWHM asserts, upon information and belief, that the Debtor is endeavoring to dispose of its interests in the Bahama island, and see that the monies from such disposition are never made available to satisfy the claims of creditors of the Debtor, including but not limited to JWHM.

4. JWHM respectfully asserts that the best interests of the creditors of the Debtor's estate are not served by a dismissal of this pending Chapter 7 case, but rather are better served by allowing the case to proceed with Mr. Segal in place as Trustee, in order for the Trustee to be able to investigate and ultimately use tools provided by the Bankruptcy Code and Rules, including but not necessarily limited to the avoidance powers under the Bankruptcy Code, to assure that assets of the Estate, including, but not limited to the Debtor's interest in Little Exuma Island, are utilized to pay legitimate claims against the estate.

5. JWHM urges that this case be maintained as a pending case before this Court, and not dismissed, in order for Mr. Segal to be allowed a reasonable time period to function as the Chapter 7 Trustee in this case and objectively pursue the administration of the Debtor's estate.

JWHM therefore respectfully urges that further discussion and investigation, along with the protection of the automatic stay and the tools provided by the Bankruptcy Code, utilized by

Mr. Segal as the duly-appointed independent trustee of the Debtor's estate, will be the most effective means to investigate potential recovery to creditors of the Debtor's estate, and is in the best interests of the Debtor's estate at this time.

DATED this 28th day of October, 2009.

JONES WALDO HOLBROOK & McDONOUGH, P.C.

s/Jeffrey Weston Shields
Jeffrey Weston Shields
Attorney for Jones Waldo Holbrook & McDonough, P.C.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **OBJECTION OF CREDITORS FAIRSTAR RESOURCES LTD AND GOLDLAW PTY LTD TO U.S. TRUSTEE'S RECOMMENDATION OF AUTOMATIC DISMISSAL** was filed electronically with the Clerk of Court using the CM/ECF system, which sent electronic notification of such filing, on this 28th day of October, 2009, to each of the following:

Scott T. Blotter	scottb@keithbartonlaw.com; thoran@keithbartonlaw.com; susan@scottblotterlaw.com; scott@scottblotterlaw.com; thora@scottblotterlaw.com
John T. Morgan tr Douglas R. Short	john.t.morgan@usdoj.gov; james.gee@usdoj.gov DOUGS@KEITHBARTONLAW.COM; tinac@keithbartonlaw.com
United States Trustee	USTPRegion19.SK.ECF@usdoj.gov
David R Evans	devans@elhlawfirm.com
Jeffrey M. Jones	jjones@djplaw.com
Robert Prince	rprince@kmlaw.com

s/Jeffrey Weston Shields